

JACK P. DICANIO (SBN 138782)  
Jack.DiCanio@skadden.com  
EMILY REITMEIER (SBN 305512)  
Emily.Reitmeier@skadden.com  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
525 University Avenue  
Palo Alto, California 94301  
Telephone: (650) 470-4500  
Facsimile: (650) 470-4570

MATTHEW E. SLOAN (SBN 165165)  
Matthew.Sloan@skadden.com  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
300 South Grand Avenue, Suite 3400  
Los Angeles, California 90071-3144  
Telephone: (213) 687-5000  
Facsimile: (213) 687-5600

*Attorneys for Defendant*  
FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

UNITED MICROELECTRONICS  
CORPORATION, et al.,

Defendants.

CASE NO.: 3:18-cr-00465-MMC

**DECLARATION OF MATTHEW E.  
SLOAN IN SUPPORT OF  
DEFENDANT FUJIAN JINHUA  
INTEGRATED CIRCUIT CO., LTD.'S  
MOTION *IN LIMINE* NO. 1  
TO PARTIALLY EXCLUDE THE  
EXPERT TESTIMONY OF DR.  
THOMAS W. DYER**

Judge: The Honorable Maxine M. Chesney  
Trial Date: February 14, 2022

Hearing Date: January 18, 2022  
Hearing Time: 10:00 a.m.

**DECLARATION OF MATTHEW E. SLOAN**

I, Matthew E. Sloan declare and state as follows:

1. I am a partner at Skadden, Arps, Slate, Meagher & Flom LLP, counsel of record for Defendant Fujian Jinhua Integrated Circuit Co., Ltd. ("Jinhua"). I am an attorney licensed to practice law in the State of California and before this Court. I submit this declaration in support of Jinhua's Motion *In Limine* No. 1 for an Order To Exclude The Expert Testimony Of Dr. Thomas W. Dyer (the "Motion"). This declaration is based upon my personal knowledge, and, if called to testify, I could and would do so competently as to the matters set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of the July 2, 2021 Expert Witness Disclosure of Dr. Thomas W. Dyer (the "Opening Expert Disclosure"), exclusive of any attached exhibits.

3. Attached hereto as Exhibit B is a true and correct copy of the October 15, 2021 Rebuttal Expert Disclosure of Dr. Thomas W. Dyer (the "Rebuttal Expert Disclosure"), exclusive of any attached exhibits. Because the government marked a portion of Exhibit B as "Confidential," Jinhua must file that portion under seal pursuant to the Protective Order. Accordingly, Jinhua has filed a motion to file this exhibit under seal concurrently herewith, and attaches a partially redacted version of the Rebuttal Expert Disclosure hereto.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 1st day of December, 2021 in Los Angeles, California.

By: /s/ Matthew E. Sloan  
Matthew E. Sloan

**SIGNATURE ATTESTATION**

Pursuant to Civil Local Rule 5-1(i), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

/s/ Jack P. DiCanio  
Jack P. DiCanio

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